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Attorneys for General Motors LLC

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re	:	Chapter 11
	:	
MOTORS LIQUIDATION COMPANY, <i>et al.</i> ,	:	Case No.: 09-50026 (REG)
f/k/a General Motors Corp., <i>et al.</i>	:	
	:	
Debtors.	:	(Jointly Administered)
	x	

**NOTICE OF FILING OF SUPPLEMENT TO THE CHART OF PRE-CLOSING
ACCIDENT LAWSUITS SET FORTH IN THE MOTION OF GENERAL
MOTORS LLC PURSUANT TO 11 U.S.C. §§ 105 AND 363 TO ENFORCE
THE COURT'S JULY 5, 2009 SALE ORDER AND INJUNCTION
AGAINST PLAINTIFFS IN PRE-CLOSING ACCIDENT LAWSUITS**

PLEASE TAKE NOTICE that on October 6, 2014, General Motors LLC filed the attached *Supplement to the Chart of Pre-Closing Accident Lawsuits Set Forth in the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction Against Plaintiffs in Pre-Closing Accident Lawsuits* with the United States Bankruptcy Court for the Southern District of New York.

Dated: New York, New York
October 6, 2014

Respectfully submitted,

/s/ Scott I. Davidson

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**SUPPLEMENT¹ TO CHART OF
PRE-CLOSING ACCIDENT LAWSUITS
COMMENCED AGAINST NEW GM NOT LISTED
IN MOTION TO ENFORCE**

	<u>Lead Plaintiff Name</u>	<u>Date of Accident (Plaintiff)</u>	<u>Vehicle Year and Model</u>
1	Bledsoe ²	February 1, 2008 and May 17, 2009 (Bledsoe) ³	2008 Chevy Cobalt

¹ Pursuant to the *Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction Against Plaintiffs in Pre-Closing Accident Lawsuits* (the "Motion to Enforce") [Dkt. No. 12808-1], New GM reserved the right to supplement the list of Pre-Closing Accident Lawsuits set forth in the Motion to Enforce in the event additional cases were brought against New GM that implicate similar provisions of the Sale Order and Injunction. See Motion to Enforce, p. 7 n.6.

² The Action identified in the chart above is captioned *Bledsoe, et al., v. General Motors LLC*, pending in the United States District Court for the Southern District of New York (the "Bledsoe Action"). A copy of the complaint filed in the Bledsoe Action is attached hereto as Exhibit "A."

³ The Bledsoe Action contains allegations concerning five separate accidents, two that allegedly occurred (with respect to the same Plaintiff) prior to the closing of the 363 Sale, and three that allegedly occurred after the closing of the 363 Sale. This supplement is being filed to designate, as being applicable to New GM's Pre-Closing Accident Motion to Enforce, the two accidents that occurred prior to the closing of the 363 Sale, and which are referenced in the chart above. However, in addition to allegations concerning pre-closing accidents, the Bledsoe Complaint also contains allegations concerning vehicles with ignition switch defects and other alleged defects, and asserts economic loss claims in connection therewith. Accordingly, New GM is also filing simultaneously herewith supplemental schedules in connection with its Ignition Switch Motion to Enforce and its Monetary Relief Motion to Enforce to address those allegations.